



21 November 2024

## **NOTICE**

### **RE: Financial Sanctions**

1. The Cayman Islands Monetary Authority ("CIMA") hereby notifies you that it has received a new Notice from the Office of Financial Sanctions Implementation, HM Treasury ("OFSI"), which is attached as an Annex to this Notice.
2. **What you must do:**
  - A. In the case of an addition or amendment of a person to the [Consolidated List](#) and asset freeze:
    - i. Check whether you maintain any accounts or hold any funds or economic resources for the persons set out in the OFSI Notice;
    - ii. Freeze any such accounts and other funds or economic resources.
    - iii. Refrain from dealing with the funds or assets or making them available (directly or indirectly) to such persons unless licensed by the Governor.
    - iv. Report any findings to the Financial Reporting Authority ("FRA") at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) together with any additional information that would facilitate compliance with the relevant legislative requirements.
    - v. Provide any information concerning the frozen assets of designated persons to the FRA at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) and submitting a compliance reporting form. Information reported to FRA may be passed to other regulatory authorities or law enforcement.
  - B. In the case of the removal of a person from the [Consolidated List](#) and unfreezing of assets
    - i. Check whether you have frozen assets of any person or entity removed from the Consolidated List and verify that the person is no longer subject to an asset freeze.
    - ii. Remove the person from your institution's list of persons or entities subject to financial sanction.
    - iii. Un-freeze the assets of the person and where necessary re-activate all relevant accounts.
    - iv. Send advice to the person that the assets are no longer subject to an asset freeze.
    - v. Advise the FRA at [financialsanctions@gov.ky](mailto:financialsanctions@gov.ky) of the actions taken.
3. Failure to comply with financial sanctions legislation or to seek to circumvent its provisions is a criminal offence.

### **Further Information.**

4. For general information on financial sanctions please see FRAs Industry Guidance on targeted financial sanctions.  
<https://fra.gov.ky/guides-to-financial-sanctions/>.
5. Enquiries regarding this sanctions notice should be addressed to  
The Sanctions Coordinator  
Financial Reporting Authority  
P.O. Box 1054  
Grand Cayman KY1-1102  
Cayman Islands  
[FinancialSanctions@gov.ky](mailto:FinancialSanctions@gov.ky)

**REGIME: Global Anti-Corruption**

**INDIVIDUAL**

1. **Names (Last):** DOS SANTOS **(1):** ISABEL **(2):** n/a **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** n/a  
**A.K.A:** n/a  
**Date of Birth:** 20/04/1973  
**Place of Birth:** Baku  
**Nationality:** Angola  
**Passport Number:** n/a **Passport Details:** n/a  
**Address:** n/a  
**Other Information** (UK Sanctions List Ref): GAC0050 (UK Statement of Reasons): Isabel DOS SANTOS is an involved person within the meaning of the Global Anti-Corruption Regulations 2021 on the basis of the following grounds: DOS SANTOS is or has been involved in (1) being responsible for or engaging in serious corruption; (2) profiting financially or obtaining any other benefit from serious corruption. Specifically, DOS SANTOS, whilst head of Angolan state oil firm Sonangol, misappropriated more than 50 million GBP for her own financial benefit and, whilst director of the Angolan telecoms company Unitel SA, misappropriated more than 300 million GBP for her own financial benefit. .  
**Listed On:** 21/11/2024  
**Last Updated:** 21/11/2024  
**Group ID:** 16694
2. **Names (Last):** FIRTASH **(1):** DMITRY **(2):** VASYLOVYCH **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** n/a  
**A.K.A:** (1) DIMITRY FIRTASH (2) DMYTRO FIRTASH  
**Date of Birth:** 02/05/1965  
**Place of Birth:** Ternopil Oblast  
**Nationality:** Ukraine  
**Passport Number:** n/a **Passport Details:** n/a  
**Address:** Gloriettegasse 10, Wien, Austria.  
**Other Information** (UK Sanctions List Ref): GAC0055 (UK Statement of Reasons): Dmitry FIRTASH is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) FIRTASH is or has been involved in being responsible for or engaging in serious corruption. Specifically, FIRTASH has been involved in the bribing of public officials to obtain mining licenses, and FIRTASH has been involved in the misappropriation of property from the gas transport

network of Ukraine. .

**Listed On:** 21/11/2024

**Last Updated:** 21/11/2024

**Group ID:** 16699

3. **Names (Last):** FIRTASH **(1):** LADA **(2):** PAVLOVNA **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** n/a  
**A.K.A:** n/a  
**Date of Birth:** 26/06/1972  
**Place of Birth:** Kashira  
**Nationality:** (1) Cyprus (2) Russia (3) Ukraine  
**Passport Number:** n/a **Passport Details:** n/a  
**Address:** 8 Cottage Place, London, United Kingdom.  
**Other Information** (UK Sanctions List Ref): GAC0056 (UK Statement of Reasons): Lada FIRTASH is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) FIRTASH is or has been involved in profiting financially or obtaining any other benefit from serious corruption. Specifically, FIRTASH has profited financially from the corruption of her husband, Dmitry FIRTASH; and (2) FIRTASH is associated with a person who is or has been involved in serious corruption, namely her husband Dmitry FIRTASH. .  
**Listed On:** 21/11/2024  
**Last Updated:** 21/11/2024  
**Group ID:** 16700
4. **Names (Last):** GORBUNENKO **(1):** DENIS **(2):** VLADIMIROVICH **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** n/a  
**A.K.A:** (1) DENIS VLODYMYROVICH GORBUNENKO (2) DENIS HORBUNENKO  
**Date of Birth:** 09/12/1973  
**Place of Birth:** Donetsk Oblast  
**Nationality:** Ukraine  
**Passport Number:** n/a **Passport Details:** n/a  
**Address:** n/a  
**Other Information** (UK Sanctions List Ref): GAC0057 (UK Statement of Reasons): Denis GORBUNENKO is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: (1) Denis GORBUNENKO has been involved in engaging in serious corruption. Specifically, Denis GORBUNENKO engaged in serious corruption for the benefit of Dmitry FIRTASH while in a controlling position at Rodovid Bank; (2) GORBUNENKO is or has been involved in transferring or converting, or facilitating the transfer or conversion of, any profit or proceeds from serious corruption. Specifically, GORBUNENKO has been involved in facilitating the transfer or conversion of the profit or proceeds of Dmitry FIRTASH's serious corruption; and (3) GORBUNENKO is acting on behalf of a person who is or has been involved in serious corruption, namely Dmitry FIRTASH. .  
**Listed On:** 21/11/2024  
**Last Updated:** 21/11/2024  
**Group ID:** 16701

5. **Names (Last):** LEMBERGA **(1):** LIGA **(2):** n/a **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** n/a  
**A.K.A:** n/a  
**Date of Birth:** 00/07/1976  
**Place of Birth:** n/a  
**Nationality:** Latvia  
**Passport Number:** n/a **Passport Details:** n/a  
**Address:** n/a  
**Other Information** (UK Sanctions List Ref): GAC0054 (UK Statement of Reasons): Liga LEMBERGA is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: LEMBERGA is or has been involved in (1) facilitating or providing support for serious corruption; (2) profiting financially or obtaining any other benefit from serious corruption. Specifically, LEMBERGA has been involved in the bribery and misappropriation of her father, Aivars Lembergs. .  
**Listed On:** 21/11/2024  
**Last Updated:** **21/11/2024**  
**Group ID:** 16698
6. **Names (Last):** LEMBERGS **(1):** AIVARS **(2):** n/a **(3):** n/a **(4):** n/a **(5):** n/a  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** n/a  
**A.K.A:** n/a  
**Date of Birth:** 26/09/1953  
**Place of Birth:** Jēkabpils  
**Nationality:** Latvia  
**Passport Number:** n/a **Passport Details:** n/a  
**Address:** Ventspils, Latvia.  
**Other Information** (UK Sanctions List Ref): GAC0053 (UK Statement of Reasons): Aivars LEMBERGS is an involved person under the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: LEMBERGS is or has been involved in (1) being responsible for or engaging in serious corruption Specifically, LEMBERGS, whilst mayor of Ventspils, has been responsible for or has engaged in serious corruption by way of bribery and the misappropriation of property. .  
**Listed On:** 21/11/2024  
**Last Updated:** **21/11/2024**  
**Group ID:** 16697
7. **Names (Last):** OLIVEIRA **(1):** PAULA **(2):** CRISTINA **(3):** FIDALGO **(4):** CARVALHO **(5):** DAS NEVES  
**Name (non-Latin):** n/a  
**Title:** n/a  
**Position:** n/a  
**A.K.A:** n/a  
**Date of Birth:** n/a  
**Place of Birth:** n/a  
**Nationality:** (1) Angola (2) Portugal  
**Passport Number:** n/a **Passport Details:** n/a  
**Address:** n/a  
**Other Information** (UK Sanctions List Ref): GAC0052 (UK Statement of Reasons): Paula OLIVEIRA is an involved person within the meaning of the Global Anti-Corruption Sanctions

Regulations 2021 on the basis of the following grounds: OLIVEIRA is or has been involved in (1) providing support for or facilitating serious corruption; or (2) profiting financially or obtaining any other benefit from serious corruption; or (3) in transferring or converting, or facilitating the transfer or conversion of, the profits or proceeds from serious corruption. Specifically, OLIVERIA has been involved in the misappropriation of property by Isabel DOS SANTOS from the Angolan state oil firm Sonangol. .

**Listed On:** 21/11/2024

**Last Updated:** 21/11/2024

**Group ID:** 16696

8. **Names (Last):** RAIKUNDALIA **(1):** SARJU **(2):** n/a **(3):** n/a **(4):** n/a **(5):** n/a

**Name (non-Latin):** n/a

**Title:** n/a

**Position:** n/a

**A.K.A:** n/a

**Date of Birth:** n/a

**Place of Birth:** n/a

**Nationality:** Portugal

**Passport Number:** n/a **Passport Details:** n/a

**Address:** n/a

**Other Information** (UK Sanctions List Ref): GAC0051 (UK Statement of Reasons): Sarju RAIKUNDALIA is an involved person within the meaning of the Global Anti-Corruption Sanctions Regulations 2021 on the basis of the following grounds: RAIKUNDALIA is or has been involved in (1) being responsible for or engaging in serious corruption; (2) providing support for or facilitating serious corruption; (3) transferring or converting or facilitating the transfer or conversion of, the profits or proceeds from serious corruption; (4) profiting financially or obtaining any other benefit from serious corruption. Specifically, RAIKUNDALIA has been involved in the misappropriation of property by Isabel Dos Santos from the Angolan state oil firm Sonangol. .

**Listed On:** 21/11/2024

**Last Updated:** 21/11/2024

**Group ID:** 16695